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Internet Communications Inc. | 739 Commerce Drive | Franklin, IN 46131

Citizens Broadband Radio Service

GN Docket No. 12-354

Internet Communications Inc (ICI) is a Fixed Wireless Internet Provider based out of Franklin, Indiana. ICI offers broadband services in portions of Marion, Morgan, Johnson, Shelby and Bartholomew Counties in Central Indiana. As of today, ICI has the largest Cambium equipment network in Indiana with substantial investments in various licensed and unlicensed radio technology ongoing. The company has been in business for over 15 years and currently provides broadband service to literally thousands of households and businesses. Our service offerings range from 1.5Mbps – 1Gbps depending on trees, population density, backhaul capacity and usable spectrum. We have been making and continue to make substantial investments (well over six figures) in the 3650-3700 MHz NN spectrum band. ICI is looking forward to leveraging a combination of PAL licenses and GAA spectrum to enhance our broadband offerings with higher capacity and speed. We need it and our customers want it.

We believe the FCC has envisioned the most efficient method of spectrum sharing in history with the creation of the CBRS band. I believe the FCC should authorize PALs on census tracts with no more than a five-year license term with renewal expectancy. This will successfully accommodate rural, suburban and metropolitan broadband interests, if the rules are not changed or are only modified slightly. The cost and complexity of LTE equipment and technology is lessening daily. Features such as Cloud and Onboard EPCs, Carrier Aggregation, LTE-U, LAA and much more will revolutionize this “innovation band”.



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For the first time in recent history, small business entities, municipal and county governments, agricultural, mining, and oil industries, school systems, rural ISPs and many more, can acquire licensed spectrum for the small areas they need to license. While the carriers can certainly compete for these PAL licenses and may win, it is without a doubt a great plan to enable competition in telecommunications outside the big four cell carriers. Innovation advances faster when barriers to entry are removed. The current CBRS rules have removed or at least reduced these barriers and the results will be phenomenal in the months and years to come. I urge you to consider this whole-heartedly and reject CTIA and T-Mobile's last-minute ploy to dominate the CBRS spectrum.

As unlicensed spectrum noise continues to increase and customer bandwidth demands are also increasing, it is essential to ALL wireless broadband providers to obtain additional spectrum. We have always used unlicensed and licensed lite NN spectrum, as we had no other affordable alternatives to acquire licensed spectrum. We are very excited with the possibility to purchase PAL licenses for our coverage area and for future growth areas, for the first time ever. We believe we may put a higher value on these licenses, than could be obtained if they are combined into larger blocks. We also believe we can leverage these licenses with faster buildouts, because of our local proximity and can manage the network and customer service much better than national companies can. We pride ourselves in providing excellent service.

The combination of LTE technology and the 3.5 – 3.7 MHz bands allow us to reach customers we have never been able to service before. The propagation of LTE is obviously superior to previous WiFi based technologies. We continue to invest heavily into this band in expectation of the proposed CBRS rules,



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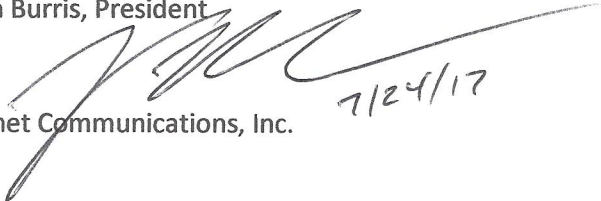
SAS database and the PAL auction proceeding as planned. Because of this, we strongly oppose the recent petitions from CTIA and T-Mobile to slant the rules in favor of large corporations.

We would like to thank the FCC Commissioners and staff for their hard work in creating the CBRS band, along with the CBRS Alliance and WinnForum. We recognize the extreme amount of work and effort has been put into creating this cohabitative band, in which all interests can participate. It is truly a remarkable feat, we urge you not to walk away from it now. It is our feeling, if this band moves forward uninhibited by restrictive additional rule changes, it will become a model for future worldwide spectrum allocations.

Respectively,

Tyson Burris, President

Internet Communications, Inc.



7/24/17